

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

MARJORIE FERRELL, <i>et al.</i> ,)	
)	
Plaintiffs,)	No. C-1-01-447
)	
v.)	Judge Sandra S. Beckwith
)	
WYETH-AYERST LABORATORIES,)	Magistrate Judge Timothy S. Hogan
INC., <i>et al.</i> ,)	
)	
Defendants.)	

**[PROPOSED] ORDER GRANTING CO-LEAD COUNSEL’S
MOTION FOR AWARD OF PARTIAL REIMBURSEMENT OF EXPENSES**

Co-Lead Counsel’s Motion for Award of Partial Reimbursement of Expenses (“Motion”) having come before this Court, notice having been given, and the Court being fully advised in the premises, this Court hereby FINDS that:

1. Plaintiffs’ expenses were reasonable and necessary to their prosecution of this litigation.
2. Defendants have agreed to pay expenses not exceeding \$325,000 and Plaintiffs have foregone \$125,419.48 in incurred expenses.

It is therefore ORDERED that:

Co-Lead Counsel’s Motion is GRANTED;

The Court awards Class Counsel \$_____ as reimbursement of their reasonable disbursements and expenses.

All of the foregoing amounts are to be paid exclusively out of the Settlement Fund to Co-Lead Counsel without additional contribution or payment by Defendants.

Any appeal from this Order shall not affect the finality of the remainder of this Final Order and Judgment, including but not limited to the date on which the Settlement will be deemed final under the terms of the Settlement Agreement.

SO ORDERED this _____ day of June, 2007.

Hon. Sandra Beckwith
United States District Court Judge